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Nevada Bar No. 5880

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Attorneys for Defendant,

10 **99 CENTS ONLY STORES LLC**

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 ROCHELLE HAMILTON, individually,

CASE NO.: 2:21-cv-01909-APG-EJY

14
15 Plaintiff,

16 vs.

17 99 CENTS ONLY STORES LLC., a Foreign
18 Limited-liability Company; and DOES 1
19 through 20; and ROE BUSINESS ENTITIES
20 1 through 20,

Defendants.

21 **STIPULATION AND ORDER TO CONTINUE DEADLINE FOR PARTIES TO FILE**
22 **JOINT PRE-TRIAL ORDER**

23
24 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff ROCHELLE
25 HAMILTON, through her counsel of record, Samantha Martin, Esq. of RICHARD HARRIS
26 LAW FIRM, and Defendant 99 CENTS ONLY STORES LLC, through its counsel record, Lew
27 Brandon, Jr., Esq, Jeffrey J. Orr, Esq. and Homero Gonzalez, Esq. of Brandon | Smerber Law
28 Firm, that the deadline to file the parties' Joint Pre-Trial shall be continued to April 5, 2023.

The Joint Pre Trial order was due on November 21, 2022. However, this deadline was stayed upon Defendant's filing of a dispositive motion, which was decided on December 2, 2022. As a result, the deadline for filing the Joint Pre-Trial Order is January 1, 2023. The purpose for this request is that the parties have agreed to mediate this matter with Judge Gene Porter, Ret. of Private Trials and have scheduled a mediation session for March 6, 2023. The parties intend to meaningfully participate and mediate this matter in good faith. The parties also understand the need to complete this Joint Pre-Trial Order should this matter not resolve at mediation. An extension of time to file the Joint Pre-Trial Order will allow the parties to focus their efforts on resolving this matter at mediation. This request is not meant to cause undue delay. Therefore, the parties respectfully request an extension of time to file the Joint Pre-Trial Order until 30 days after the mediation session, which is April 5, 2023.

IT IS SO STIPULATED.

DATED this 15th day of December 2022.

DATED this 15th day of December 2022.

RICHARD HARRIS LAW FIRM

BRANDON SMERBER LAW FIRM

/s/ Samantha Martin, Esq.
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 139 East Warm Springs
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Attorneys for Defendant,
99 CENTS ONLY STORES LLC

ORDER

IT IS SO ORDERED.

DATED: December 16, 2022


UNITED STATES MAGISTRATE JUDGE